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Comments Relating to RM-10867 on Amateur Radio Restructuring

1. General – The primary goal of the Amateur Service lies in providing for public service under emergency conditions. A secondary goal is to stimulate/encourage participative innovation in the field of electronic communication.
2. Entry Requirements – It is essential that applicants for amateur licenses demonstrate, through testing, a level of technical competence and a working familiarity with FCC operating requirements. The ARRL proposal of three operator classes fills the needs well.
3. Morse Code – The ability to send and receive Morse code is no longer vital to RF communication, even in emergency situations. In addition, the imposition of a Morse code entry requirement for amateur licensing is seen as restricting access to participation in amateur radio. In turn, this restriction is seen as undesirable in light of the over-riding goal of encouraging participation in communication under emergency conditions – for which Morse code is not required and rarely used. In fact, current participation by amateur operators is carried out overwhelmingly by Technician Class licensees, for whom Morse Code proficiency is not required. The use of Morse Code communication by amateur operators should continue to be permitted, but it should not be a requirement for entry in any class of operator.
4. Frequency Allocations for Amateur Operation – The present allocations are largely adequate and effective – with the exception of the 40 Meter band sharing with international broadcasting. However, with emergency communication and electronic innovation in mind, it may be desirable to consider an additional allocation. Please refer to 5, below.
5. NVIS Propagation - Consistent with the primary goal of communication under emergency conditions, the FCC may wish to consider stimulating interest and innovation in Near Vertical Incidence Skywave (NVIS) propagation. This can be done by broadening the present narrow authorization in the 60 Meter band. NVIS communication is effective both day and night in this band at ranges to about 200 miles. There is no skip distance. The use of ionospheric reflection prevents rough terrain, such as mountains (or tall inner city buildings?), from interfering with propagation, so that there is a reduced, even negligible, impact on transmission integrity, an important consideration for emergency communication in mountainous territory – such as last Summer's forest fires (or on 9/11?). Thus, the range is greater than is available on the VHF and UHF bands. There is no "dead" skip distance as applies in conventional propagation on the HF bands. The power requirements are well within the amateur rules.

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